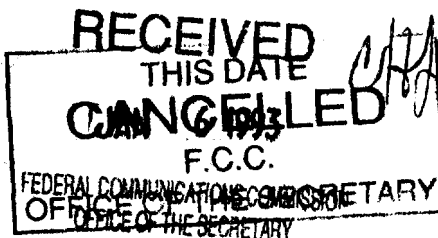


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January 11, 1993



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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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JAN 12 1993

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Office of the Secretary
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, NW
Washington, D.C. 20554

RE: "COMMENTS" MM DOCKET NO.92-270, LIBERTY, N.Y.

Dear Secretary:

Enclosed please find one original and four copies of comments filed in the above-referenced proceeding.

An additional study was not available at deadline, but we will forward it the moment it is completed.

Thank you for your consideration.

Sincerely,

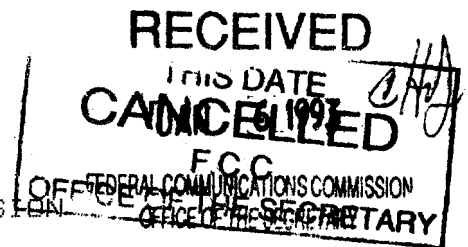
Preston Mark Pollack
Preston Mark Pollack

Susan Lea Pollack
Susan Lea Pollack

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554



In the matter of) MM Docket No. 92-270
Amendment of Section 73.202(b)) RM-8110
Table of Allotments)
FM Broadcast Stations)
Liberty, New York)
Channel 271A)

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JAN 12 1993

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COMMENTS ON AND COUNTERPROPOSAL TO

NOTICE OF PROPOSED RULE MAKING

We, Preston Mark and Susan Lea Pollack, (husband and wife) do hereby wish to comment and offer a Counterproposal to the proposed allocation of Channel 271A to Liberty, New York.

If accepted by the Commission, our Counterproposal would seek to have Channel 271A allocated to The Community of Jeffersonville, New York as it's first commercial aural service.

There are two compelling reasons for substituting Jeffersonville for Liberty as The Community of License.

- 1.) Liberty already has two commercial stations (one AM and one FM) licensed and operating in the community, while Jeffersonville has none.

2.) The coordinates of the allocation and probable antenna site as forwarded in the NPRM are of such low relative elevation that it makes it impossible that a clear signal would even reach Liberty.

We are lifelong residents of Sullivan County. Our present business takes us to all parts of the county, including Jeffersonville. Jeffersonville has it's own school district, it's own police and fire departments and it's own unique community issues that have no aural outlet for regular discussion.

Even assuming a 300 foot tower, a preliminary terrain shielding study shows that with Sullivan County's extremely rugged terrain, any new radio station would find it impossible to broadcast with a clear signal into Liberty from the location as proposed by Celenza in his petition. Dataworld has not completed printing of the terrain shielding study by today, but we will forward that study to the commission the moment it is completed.

Furthermore, if allocated as proposed, the station would have to seek a waiver of Section 73.315 (A) of the commission's rules regarding that a 3.16mV/m signal be provided over the principal community. Acceptance of such a waiver is unlikely, which makes Celenza's proposal unfavorable on it's face

especially when our counterproposal does not require such a waiver.

It is our intention to apply for the new station when it is allocated and, if authorized to do so, we will build the station as soon as possible.

Therefore, we ask that our Counterproposal be accepted and that Channel 271A be allocated to Jeffersonville, New York at the coordinates indicated. To do so would be consistent with the commission's allocation policy and would serve the greater public interest, convenience and necessity.

January 11, 1993

Respectfully Submitted,

By: Preston Mark Pollack

Preston Mark Pollack

By: Susan Lea Pollack

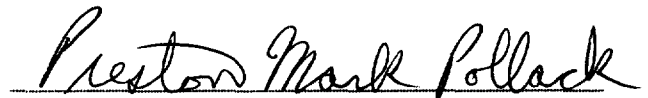
Susan Lea Pollack

CERTIFICATE OF SERVICE

I, Preston Mark Pollack, do hereby certify that copies of the foregoing have been sent by U.S. mail to the following parties:

James K. Edmundson, Esq.
GARDNER, CARTON & DOUGLAS
1301 K Street, NW
Suite 900, East Tower
Washington, D.C. 20005

Office of the Secretary
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, NW
Washington, D.C. 20554

A handwritten signature in cursive script that reads "Preston Mark Pollack". The signature is written in dark ink and is positioned above a horizontal line.

Preston Mark Pollack